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## UNITED STATES DISTRICT COURT

## FOR THE DISTRICT OF NEVADA

SCOTT GIRARD CRUMP,

Plaintiff,

vs.

WALMART, INC., a Foreign Corporation; DOE  
STORE MANAGERS I through X; DOE STORE  
EMPLOYEES I through X; DOE OWNERS I  
through X; DOE PROPERTY MANAGERS I  
through X; DOE MAINTENANCE  
EMPLOYEES I through X; DOE JANITORIAL  
EMPLOYEES I through X; ROE PROPERTY  
MANAGERS XI through XX; ROE  
MAINTENANCE COMPANIES XI through XX;  
ROE OWNERS XI through XX; ROE  
EMPLOYERS XI through XX; DOES XXI  
through XXV; and ROE CORPORATIONS,  
XXV through XXX, inclusive, jointly and  
severally,

Defendants.

Case No.: 2:22-cv-02005-CDS-EJY

**STIPULATION AND ~~[PROPOSED]~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**[First Request]**

Plaintiff SCOTT GIRARD CRUMP ("Plaintiff") and Defendant WALMART, INC. ("Defendant"), by and through their respective counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of ninety (90) days.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is their **first request to extend discovery deadlines** in this matter.

### **DISCOVERY COMPLETED TO DATE**

- The parties submitted their Joint Status Report on December 30, 2022.
- Plaintiff served his Initial Disclosure Statement Pursuant to FRCP 26(a)(1) and Initial Expert Disclosures on January 18, 2023.
- Defendant served its FRCP 26 Disclosure of Witness Statements and Documents on March 3, 2023.
- The parties conducted an FRCP 26(f) conference on March 6, 2023.
- Plaintiff conducted a Site Inspection at Defendant Walmart's premises on May 3, 2023.
- Defendant served its First Set of Interrogatories, Requests for Admissions, and Requests for Production of Documents on Plaintiff on May 25, 2023.

### **DISCOVERY TO BE COMPLETED**

- Plaintiff's responses to Defendant Walmart's First Set of Interrogatories, Requests for Admissions, and Requests for Production of Documents.
- Additional written discovery between the parties.
- Deposition of Plaintiff.
- Deposition of Defendant Walmart.
- Depositions of the parties' witnesses.
- Depositions of Plaintiff's treating physicians.
- Expert discovery, including depositions.

### **REASONS FOR THE PARTIES' REQUEST TO EXTEND**

Consistent with the requirements of LR 26-3, good cause exists for this Court to grant the parties' requested 90-day extension of deadlines as the parties are currently negotiating settlement and wish to focus their time and financial resources on early resolution. This extension also potentially avoids waste of the Court's resources, should Plaintiff's claims resolve. Moreover, the deadline for initial expert disclosures is currently July 6, 2023, which is more than 21 days after the date of submission of the instant Stipulation; accordingly, the parties' request is not untimely under

LR 26-3. The parties make this request in good faith and have no intent to delay resolution of this matter.

**PROPOSED DISCOVERY DEADLINES**

<u>Event</u>	<u>Date</u>
Amend Pleadings or Add Parties	June 6, 2023
Expert Disclosures	October 4, 2023
Rebuttal Expert Disclosures	November 3, 2023
Discovery Cut-Off	December 4, 2023
Dispositive Motions	January 2, 2024
Joint Pre-Trial Order	February 1, 2024

IT IS SO STIPULATED.

DATED this 13th day of June, 2023

ALVERSON TAYLOR & SANDERS

/s/ Tanya M. Fraser  
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DATED this 13th day of June, 2023

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IT IS SO ORDERED:

  
 UNITED STATES MAGISTRATE JUDGE

Dated: June 13, 2023

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